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HANG “HENRY” CHEN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HANG CHEN,

Defendant.

Case No. 4:18-cr-00450-JD

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING PRETRIAL
CONFERENCE DATE FOR DEFENDANT
HANG CHEN**

The Honorable James Donato

WHEREAS, on June 12, 2019, Defendant Hang “Henry” Chen filed a motion to continue the June 24, 2019, trial date (Dkt. No. 195);

WHEREAS, at the June 13, 2019, pretrial conference the Court directed Henry Chen to file a statement indicating whether he could be available for an August trial date or would agree to a trial in late 2019 or early 2020 (Dkt. No. 197);

WHEREAS, on June 14, 2019, Henry Chen filed a statement informing the Court that an August 2019 trial date would not provide him with sufficient time to prepare an adequate defense and that he was amenable to a late 2019 or early 2020 trial date (Dkt. No. 198);

WHEREAS, on June 17, 2019, the Court directed Henry Chen and the government to file by June 21, 2019, a stipulation and proposed order selecting a trial date after December 16, 2019;

WHEREAS, the parties filed a stipulation (Dkt. No. 213) on June 20, requesting a March 9, 2020, trial date;

WHEREAS, the Court set a status and trial setting conference for September 4, 2019 (Dkt. No. 245);

WHEREAS, at the September 4, 2019, conference, the Court set the matter for trial on March 9, 2020;

WHEREAS, the parties hereby request that the Court set a pretrial conference on February 12, 2020;

WHEREAS, given the volume of discovery, the complexity of the issues, and the schedules of counsel at issue in this case, the interests of justice are served by excluding time under the Speed Trial Act from June 24, 2019, up to and through March 9, 2020, to allow for the adequate preparation of counsel;

NOW, THEREFORE, it is stipulated by and between counsel for the government and Henry Chen that the time between June 24, 2019, and March 9, 2020, shall be excluded pursuant to 18 U.S.C. § 3161(h)(7).

SO STIPULATED.

DATED: September 9, 2019

COBLENTZ PATCH DUFFY & BASS LLP

By: /s/ Timothy P. Crudo
Timothy P. Crudo
Attorneys for Defendant
Hang “Henry” Chen

DATED: September 9, 2019

DAVID L. ANDERSON
United States Attorney

By: /s/ Michelle Kane
Michelle Kane
Assitant United States Attorney

~~[PROPOSED]~~ ORDER

Having considered the Stipulation Setting Pretrial Conference Date for Defendant Hang Chen, and good cause appearing therefore, the pretrial conference in this matter is set for February 12, 2020. For the reasons set forth in the above Stipulation and those enumerated in 18 U.S.C. § 3161(h)(7)(B), the Court finds pursuant to 18 U.S.C. § 3161(h)(7)(A) that the interests of justice served by excluding time until the date of trial outweigh the best interests of the public and the defendant in a speedy trial. Time therefore shall be excluded under the Speed Trial Act from June 24, 2019, until and including the trial date of March 9, 2020 to allow for the adequate preparation of counsel.

IT IS SO ORDERED.

DATED: September 10, 2019

